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Bulgaria

The present report is a compilation of the information contained in reports of the treaty bodies and special procedures, including observations and comments by the State concerned, in reports of the United Nations High Commissioner for Human Rights, and in other relevant official United Nations documents. It is presented in a summarized manner owing to word-limit constraints. For the full texts, please refer to the documents referenced. The report does not contain any opinions, views or suggestions on the part of the Office of the United Nations High Commissioner for Human Rights other than those contained in public reports and statements issued by the Office. It follows the general guidelines adopted by the Human Rights Council in its decision 17/119. Information included herein has been systematically referenced in endnotes. The report has been prepared taking into consideration the periodicity of the review, and developments during that period.

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I. Background and framework

A. Scope of international obligations[1]

International human rights treaties[2]

	Status during previous cycle	*Action after review*	*Not ratified/not accepted*
Ratification, accession or succession	ICERD (1966)	OP-CAT (2011)	ICRMW
	ICESCR (1970)	CRPD (2012)	ICPPED (signature, 2008)
	ICCPR (1970)		
	ICCPR-OP 2 (1999)		
	CEDAW (1982)		
	CAT (1986)		
	CRC (1991)		
	OP-CRC-AC (2002)		
	OP-CRC-SC (2002)		
	ICPPED (signature, 2008)		
Reservations and/or declarations	ICERD (declaration, arts. 17.1 and 18.1, 1966)		
	ICESCR (declaration, art. 26(1)(3), 1970)		
	ICCPR (declaration, art. 48(1)(3), 1970)		
	OP-CRC-AC (declaration, art.3(2), minimum age of recruitment 18 years, 2002)		
Complaints procedures, inquiries and urgent action[3]	ICERD, art. 14 (1993)		OP-ICESCR
	ICCPR, art. 41 (1993)		OP-CRC-IC
	ICCPR-OP 1 (1992)		ICRMW
	OP-CEDAW, art. 8 (2006)		OP-CRPD (signature, 2008)
	CAT, arts. 20 (1999) 21 and 22 (1993)		ICPPED (signature, 2008)
	OP-CRPD (signature, 2008)		

1. Bulgaria was encouraged to ratify ICRMW,[4] ICPPED,[5] OP-ICESCR[6] and OP-CRPD.[7]

2. The Office of the United Nations High Commissioner for Refugees (UNHCR) recommended that Bulgaria lift the reservations made to the Convention relating to the Status of Stateless Persons.[8]

Other main relevant international instruments

	Status during previous cycle	*Action after review*	*Not ratified*
Ratification, accession or succession	Convention on the Prevention and Punishment of the Crime of Genocide Rome Statute of the International Criminal Court Geneva Conventions of 12 August 1949 and Additional Protocols thereto[9] Palermo Protocol[10] The 1951 Convention relating to the Status of Refugees and its 1967 Protocol ILO fundamental conventions[11] UNESCO Convention against Discrimination in Education	Conventions on stateless persons[12]	ILO Conventions nos. 169 and 189[13]

B. Institutional and human rights infrastructure and policy measures

Status of national human rights institutions[14]

National human rights institution	*Status during previous cycle*	*Status during present cycle*[15]
Commission for Protection against Discrimination		B (2011)
The Ombudsman		B (2011)

3. The Committee against Torture (CAT) recommended that Bulgaria ensure that the Ombudsman and the Commission for Protection against Discrimination conform to the principles relating to the status of national institutions for the promotion and protection of human rights (Paris Principles). The Committee on Economic, Social and Cultural Rights (CESCR) and the Committee on the Elimination of Discrimination against Women (CEDAW) made a similar recommendation.[16] The Independent Expert on minority issues recommended that the resources available to those institutions be increased and their capacities strengthened.[17]

4. CEDAW was concerned that the national machinery for the advancement of women lacked sufficient authority, visibility and adequate resources.[18]

II. Cooperation with human rights mechanisms

5. In 2013, Bulgaria submitted its mid-term report regarding the follow-up to the recommendations put forward during the universal periodic review (UPR), which was held in 2010.[19]

A. Cooperation with treaty bodies[20]

1. Reporting status

Treaty body	*Concluding observations included in previous review*	*Latest report submitted since previous review*	*Latest concluding observations*	*Reporting status*
CERD	March 2009			Twentieth to twenty-first reports overdue since 2012
CESCR	November 1999	2009	November 2012	Sixth report due in 2017
HR Committee	July 1993	2009	July 2011	Fourth report due in 2015
CEDAW	February 1998	2010	July 2012	Eighth report due in 2016
CAT	May 2004	2009	November 2011	Sixth report due in 2015
CRC	June 2008	2014		Third to fifth reports pending consideration in 2016
CRPD		2014		Initial report pending consideration

2. Responses to specific follow-up requests by treaty bodies

Concluding observations

Treaty body	*Due in*	*Subject matter*	*Submitted in*
CERD	2010	Integration of Roma; combating police misconduct; penalizing acts of racism.[21]	2010;[25] Follow-up dialogue ongoing[26]
HR Committee	2012	Investigation of ill-treatment by police; use of lethal force; independence of the judiciary.[22]	2013,[27] 2014[28] and 2015[29]
CEDAW	2014	National machinery for advancement of women and violence against women.[23]	2014[30]
CAT	2012	Legal safeguards for detainees; police violence and use of firearms; discrimination, hate speech and violence against vulnerable groups.[24]	2012[31]

Views

Treaty body	*Number of views*	*Status*
HR Committee	1[32]	Further information requested.[34]
CEDAW	2[33]	Further information requested.[35]

B. Cooperation with special procedures[36]

	Status during previous cycle	*Current status*
Standing invitation	Yes	Yes
Visits undertaken		Independence of judges and lawyers (2011)
		Minority issues (2012)[37]
Visits agreed to in principle	Independence of judges and lawyers	Business and human rights
	Minority issues	Sale of children
Visits requested	Freedom of religion	
Responses to letters of allegation and urgent appeals	In the period under review, two communications were sent. The Government replied to them.	

C. Cooperation with the Office of the United Nations High Commissioner for Human Rights

6. Bulgaria contributed financially to OHCHR in 2012 and 2013.[38]

III. Implementation of international human rights obligations, taking into account applicable international humanitarian law

A. Equality and non-discrimination

7. The Human Rights Committee (HR Committee) was concerned that discriminatory practices against women remained widespread.[39] CEDAW reiterated its concern about stereotypical patterns regarding the roles and responsibilities of women and men in the family and society.[40]

8. CEDAW continued to be concerned at the failure to specifically prohibit discrimination against women and that a gender equality law had not been adopted, despite the recommendations of CEDAW and UPR.[41] In 2014, Bulgaria reported to CEDAW that a draft law on gender equality was being prepared.[42]

9. CESCR was concerned at the gender disparity in education and employment.[43] CEDAW expressed similar concerns.[44] Furthermore, CEDAW was concerned about the vulnerability and marginalization of disadvantaged groups of women, such as women belonging to ethnic minorities, elderly women and women with disabilities, who often suffered from multiple forms of discrimination.[45]

10. CEDAW recommended that Bulgaria diversify women's educational and professional choices, narrow and close the wage gap between women and men and strengthen the access of women, including Roma women and women belonging to other disadvantaged groups, to formal employment and entrepreneurship.[46]

11. CAT was concerned at manifestations of discrimination and intolerance against certain national and religious minorities and persons belonging to sexual minorities.[47] The HR Committee and CESCR expressed similar concerns.[48]

12. CAT was concerned that slogans amounting to hate speech had been voiced against minority groups, including by members of certain political parties and groups, and that intolerance towards religious minorities had resulted in vandalism of places of worship and attacks on worshippers.[49] The Independent Expert on minority issues stated that, despite the identification and arrest of individuals who had participated in violent attacks, there were few prosecutions and only small fines applied to those convicted.[50] The HR Committee regretted the poor enforcement of the legislation on anti-discrimination and hate speech.[51]

13. The HR Committee was concerned at the widespread discrimination against the Roma population, especially in access to education, employment, health and housing.[52] The Independent Expert on minority issues stated that Roma experienced discrimination and exclusion in all walks of life. She highlighted racial prejudice against Roma and the negative media coverage and discriminatory stereotyping of the Roma by the media and in some political discourse. The Independent Expert concluded that the Government initiatives and financial commitments had failed to address discrimination, exclusion and poverty faced by Roma.[53]

14. UNHCR stated that refugee issues continued to receive a wider coverage, characterized with frequent hate-filled xenophobic remarks and messages. It noted numerous incidents of violence based on anti-foreigner and specifically anti-refugee sentiment in 2013.[54]

15. CAT recommended that Bulgaria eradicate stereotypes and discrimination against Roma and other national minorities, prohibit and prevent advocacy of hate speech, discrimination and intolerance and enforce anti-discrimination legislation.[55] UNHCR recommended that Bulgaria prevent and respond to incidents relating to racism, racial discrimination, xenophobia and related intolerance.[56]

16. CAT recommended that offences motivated by discrimination constitute an aggravating circumstance in criminal prosecution.[57] The HR Committee recommended that Bulgaria investigate and sanction acts of hate crime, hate speech and harassment against minorities and religious communities.[58] CESCR[59] and the Independent Expert on minority issues[60] made related recommendations.

B. Right to life, liberty and security of the person

17. CAT was concerned that 238 institutionalized children with mental disabilities had died in the period 2000–2010 without a single indictment being made. It recommended that Bulgaria investigate, prosecute, convict and sanction those responsible for the deaths and strengthen legislation to enhance accountability and prevent recurrence and impunity.[61]

18. The HR Committee was concerned at the large number of cases of torture and other inhuman and degrading treatment and that none of those cases had resulted in sanctions against the police officers involved. It recommended that Bulgaria eradicate all forms of harassment by police and ill-treatment during investigations, prosecute perpetrators.[62]

19. Furthermore, CAT urged Bulgaria to adopt a definition of torture, covering all the elements contained in the Convention and to include torture as a separate and specific crime in its legislation. Bulgaria should ensure that the absolute prohibition against torture is non-derogable and that acts amounting to torture are not subject to any statute of limitations.[63]

20. CAT was concerned by the excessive use of force and of firearms by law enforcement officers.[64] CAT and the HR Committee urged Bulgaria to ensure that regulations on the use of firearms conform to international standards.[65] In 2013, Bulgaria reported to the HR Committee that the "absolute necessity" standard for the use of weapons, physical force and means of restraint by police authorities had been introduced.[66]

The HR Committee requested a copy of the amendments to assess its compliance with international standards.[67] In 2014, Bulgaria provided the requested information.[68]

21. CAT was concerned at the reported existence of underground investigative detention facilities in five locations where remand prisoners were held, that some cells did not have windows and that some had less than 1 m^2 of living space per detainee. It was also concerned by conditions of detention in many police stations where cells did not conform to international standards of hygiene and were unsustainable for overnight use. In some cases, detained persons spend the first 24 hours in an area with bars, referred to as the "cage". CAT was concerned at reports that some detainees were handcuffed to immovable objects, such as radiators or a chair, for up to six hours. It recommended that the treatment of prisoners in investigative detention centres and detainees in police stations conform to international standards.[69]

22. The HR Committee remained concerned at the overcrowding of prisons, the sanitary conditions of detention facilities, deficient medical services and the lack of trained penitentiary officers. Bulgaria should respect the Standard Minimum Rules for the Treatment of Prisoners, implement its projects for the construction of new prisons and introduce non-incarceration alternatives in the penal sanction system.[70] CAT made similar observations.[71]

23. CAT was concerned that overcrowding and understaffing were conducive to inter-prisoner violence in detention facilities and that investigation procedures were opened for small number of cases. It was concerned about incidences of sexual violence and harassment and beatings, and about the large number of deaths in custody. CAT recommended that Bulgaria prevent inter-prisoner violence and protect prisoners from such violence, particularly lesbian, gay, bisexual and transgender persons, and investigate incidents of death in custody and prosecute the persons responsible.[72]

24. CAT was concerned that detainees continued to be held in solitary confinement for disciplinary violations and crimes. It recommended that Bulgaria prohibit the imposition of solitary confinement as punishment and implement alternative disciplinary sanctions.[73]

25. CAT recommended that Bulgaria consider amending legislation concerning the strict regime of segregation during the first five years and handcuffing when outside their cells for prisoners serving life sentences.[74]

26. CEDAW and CESCR were concerned about the high prevalence of domestic violence.[75] The HR Committee noted with regret the low number of cases of domestic violence that had been brought to justice and sanctioned.[76] CAT and the HR Committee expressed concern that allegations of domestic violence must be initiated by the victim in cases of light or average bodily harm.[77] CEDAW was concerned about article 158 of the Criminal Code, which enabled the termination of criminal proceedings against rapists when they marry their victims.[78]

27. The HR Committee recommended that Bulgaria prevent domestic violence, particularly violence against women.[79] CEDAW recommended that Bulgaria ensure that sufficient State-funded shelters are available to women victims of domestic violence and their children and to provide support to non-governmental organizations offering support to the victims.[80]

28. Furthermore, CEDAW urged Bulgaria to, inter alia, criminalize specifically domestic violence and marital rape and to introduce the possibility of ex officio prosecution for both offences.[81] It urged Bulgaria to repeal article 158 of the Criminal Code and to ensure that all acts of sexual violence against women and girls are effectively investigated, perpetrators are prosecuted and their sentences are commensurate with the gravity of their crimes.[82] Bulgaria reported to CEDAW that the new draft Criminal Code had been prepared

in accordance with recommendations made by CEDAW and submitted to the National Assembly in January 2014.[83]

29. CAT was concerned by the practice of early and forced marriage of Roma girls as young as 11.[84] CEDAW[85] and the HR Committee[86] expressed a similar concern. CAT urged Bulgaria to enforce the legislation concerning minimum marriage age and the prohibition of early marriages.[87]

30. The United Nations Children's Fund (UNICEF) highlighted a need to enforce the prohibition of all forms of corporal punishment.[88] CAT was concerned in particular that the use of corporal punishment was higher in institutions for children with disabilities. It recommended that Bulgaria promote non-violent methods of childrearing and education, ensure that the law prohibiting corporal punishment is enforced and provide effective and appropriate responses to corporal punishment, including investigations, prosecution and sanctioning of perpetrators.[89] The HR Committee made similar observations.[90]

31. CESCR was concerned that socially vulnerable children, especially Roma children, remained engaged in harmful and exploitative labour, particularly in agriculture, industry and domestic service. It recommended that Bulgaria strengthen awareness, prevention and assistance programmes to address the problems of child labour and street children.[91] The ILO Committee of Experts on the Application of Conventions and Recommendations (ILO Committee of Experts) requested Bulgaria to redouble its efforts to protect street children from the worst forms of child labour, and to provide for their rehabilitation and reintegration.[92]

32. CESCR was concerned about the increase of human trafficking, despite the actions developed by the National Commission for Combating Human Trafficking and the implementation of the National Programme for Prevention and Counteraction of Human Trafficking and Protection of Victims.[93] CEDAW remained concerned about gaps in the implementation of legislation and strategies, the lack of preventive measures to address the root causes of trafficking and the scarcity of shelters for trafficking victims. It noted inadequate assistance and protection provided to victims and the lack of rehabilitation procedures, compensation and of funding for non-governmental organizations that provided assistance and temporary shelter to victims.[94]

C. Administration of justice and the rule of law

33. While taking note of the Judiciary Reform Strategy for 2009–2013, CAT was concerned by the lack of progress in judicial reform, the lack of transparency regarding the selection and appointment of judges and members of the Supreme Judicial Council and that the principle of the independence of the judiciary was not respected by the organs outside the judiciary, nor fully applied within the judiciary.[95] In 2011, the HR Committee expressed similar concerns[96] and referred again to this issue in 2013[97] and 2014[98] in the framework of the follow up.

34. CAT recommended that Bulgaria accelerate judicial reform.[99] The Special Rapporteur on the independence of judges and lawyers indicated that, in order to make the independence of the judiciary a reality, further consideration of structural factors was required, such as clearly separating the role and function of the prosecution and investigation service from the courts.[100] She recommended that Bulgaria ensure access to the judicial career through periodic competitive examinations and introduce competitive processes and periodic evaluation for the promotion of judges and for filling temporary positions.[101] Furthermore, she recommended that Bulgaria ensure a transparent process of allocation of resources to the judiciary, recognize the rights of the judiciary to participate in

drafting and in deliberations on its budget in the legislature and to manage its own budget and ensure that the courts are adequately resourced.[102]

35. The Special Rapporteur on the independence of judges and lawyers recommended that Bulgaria ensure appropriate contact between lawyers and defendants in cases requiring State-sponsored legal aid and establishing safeguards to ensure that lawyers withdraw cases only when there is a reason that can be substantiated under applicable law.[103]

36. CAT recommended that Bulgaria, inter alia, ensure that the National Bureau of Legal Aid is provided with adequate resources.[104] In 2012, Bulgaria reported to CAT on measures that were taken related to access to legal aid, including the amendment of the Legal Assistance Act, increased budget for legal assistance and the number of staff of the National Legal Assistance Bureau.[105]

37. CAT was concerned about the lack of legislation ensuring non-admissibility of evidences obtained as a result of torture. It recommended that Bulgaria enact legislation specifically prohibiting the use of statements obtained under torture as evidence.[106]

38. CAT urged Bulgaria to provide victims of torture, including those who suffered torture and ill-treatment in centres for persons with mental disabilities, with redress and fair and adequate compensation and means for rehabilitation.[107]

39. UNICEF stated that the reform of the juvenile justice system was progressing slowly despite the adoption of the Concept for Public Policy of Justice for Children (2011) and of the road map for its implementation (2013).[108] The HR Committee regretted the delay in reforming the juvenile justice system and recommended that Bulgaria consider the implementation of the reform as a matter of priority.[109]

40. UNICEF stated that children were often interrogated by officers with no specialized training, that several interrogations of children victims of violence took place during judicial processes, thus leading to the traumatization of those children, and that court hearings of child victims and witnesses were envisaged in the presence of the accused.[110]

41. The HR Committee was concerned at the allegations of persistent corruption within the justice system, the lack of convincing results in the fight against high-level corruption, and the lack of public trust in the administration of justice.[111] CAT expressed similar concerns.[112] The HR Committee was concerned at alleged practices of corruption within the penitentiary institutions.[113]

42. The Special Rapporteur on the independence of judges and lawyers noted that the Specialized Criminal Court and the Appellate Specialized Criminal Court had been created to handle cases of corruption and organized crime and had become operational in 2012.[114] She recommended that Bulgaria ensure full respect for procedural safeguards and the independence and impartiality of those courts and provide them with appropriate resources.[115]

D. Right to privacy, marriage and family life

43. The HR Committee remained concerned at the widespread practice of telephone tapping under the Special Surveillance Means Act. Bulgaria should guarantee that monitored telephone conversations are considered only as complementary evidence in criminal cases and are practised strictly in relation to court proceedings and that persons who were wrongfully monitored are informed and have access to adequate remedies.[116]

44. CEDAW recommended that effective remedies be put in place to enable women to claim and receive child support from their former husbands or partners.[117]

45. CESCR was concerned that couples in de facto unions and the status of children born as a result of those relationships were not protected by law. It recommended that Bulgaria ensure de jure equality between de facto and official unions and guarantee the full protection of the rights of children born out of wedlock.[118]

46. CESCR was concerned that same-sex couples were not legally recognized and by the absence of a legal framework for the protection of the rights of same-sex couples. It recommended that same-sex couples be recognized legally.[119]

47. UNICEF noted a reduction in the numbers of children in institutional care and an increase in the number of children entering alternative community-based family-type care or foster care.[120] CAT noted the envisaged transition from institutional to community-based care similar to a family environment and the closure of all childcare institutions within 15 years.[121] However, the HR Committee remained concerned at the number of children who would remain in those institutions for the next 15 years.[122]

48. The HR Committee urged Bulgaria to close all children's institutions and establish practical alternatives to institutionalization.[123] CESCR recommended that Bulgaria fully implement the reform of the residential care system for children, focusing on the integration of children who leave institutional care, and clarify the legal status of children without a family who leave institutional care and provide them with adequate family substitute and family support services.[124]

E. Freedom of religion or belief and expression, and right to participate in public and political life

49. The HR Committee was concerned at the ambiguity in the Religious Denominations Act, which incorporated a specific registration procedure for the Bulgarian Orthodox Church. Bulgaria should revise the provisions of the Act to harmonize the registration procedure and modalities for all religious organizations.[125]

50. The United Nations Educational, Scientific and Cultural Organization (UNESCO) recommended that Bulgaria ensure that journalists and media workers are able to practice their professions in a free and safe environment and investigate all attacks on journalists and media workers.[126] It was recommended that Bulgaria decriminalize defamation.[127]

51. CEDAW encouraged Bulgaria to accelerate the participation of women in public and political life and to increase the number of women in top positions, including by implementing temporary special measures. It recommended providing incentives for political parties to nominate equal numbers of women and men as candidates, adopting electoral rules that guarantee women an equal chance of being elected and creating an enabling environment for political participation of women.[128]

52. The Special Rapporteur on the independence of judges and lawyers recommended that Bulgaria ensure that women are able to occupy high-level positions within the judiciary and in the justice system in general.[129]

F. Right to work

53. CESCR was concerned about the recent rise in unemployment and long-term unemployment rates, which negatively affected the population, especially young persons, migrants, Roma and persons with disabilities.[130] The ILO Committee of Experts noted that regional unemployment rates varied substantially, with Northern regions having an unemployment rate higher than the national average.[131]

54. CESCR recommended that Bulgaria amend its legislation to accord all categories of civil servants with their right to strike.[132]

G. Right to social security and to an adequate standard of living

55. CESCR was concerned that a significant proportion of the population lived below the poverty line and about regional disparities in this regard.[133] CEDAW was concerned about the feminization of poverty, in particular Roma women, women with disabilities and rural and older women, and about the fact that the anti-poverty strategy did not integrate a gender perspective.[134]

56. CESCR was concerned that some groups within the population, especially most disadvantaged and marginalized members, including Roma, did not have access to adequate housing. It recommended that Bulgaria implement the 2010 Act, encouraging low-cost housing construction and pursue its social housing construction programme.[135]

H. Right to health

57. UNICEF stated that, despite the constitutional provisions guaranteeing all women access to free of charge obstetric care, pregnant women without health insurance were guaranteed only one medical check-up during pregnancy.[136] Practices in maternal hospitals often involved violation of the basic rights of women and children. Treatment in hospitals in some cases could inflict serious psychological harm to women and could be considered as amounting to psychological and physical violence.[137]

58. CEDAW remained concerned about the increased number of early pregnancies and the high rate of abortion, particularly among teenagers and women under 20 years of age.[138] CESCR called on Bulgaria to prevent teenage pregnancies and to provide the necessary support services for pregnant adolescents, including measures to enable them to continue their education.[139]

59. CEDAW recommended that Bulgaria promote education on sexual and reproductive health, targeting adolescent girls and boys, and provide adequate family planning services and affordable contraceptives, in line with the recommendations made during the UPR.[140]

60. CESCR recommended ensuring that treatment and care is available to and accessible by persons living with HIV/AIDS and by Alzheimer patients and that the referred treatments are effectively covered by the social security scheme.[141]

I. Right to education

61. CESCR noted with concern that high dropout rates persisted, especially within disadvantaged and marginalized groups of the population.[142] CEDAW reiterated its concern at the high dropout rates of Roma girls.[143]

62. UNICEF noted the high percentage of children who did not receive the compulsory pre-school training owing to the limited access to pre-school education in small towns and villages and for socially vulnerable groups.[144]

63. UNESCO encouraged Bulgaria to increase the budget allotted to education and to promote human rights education.[145]

J. Persons with disabilities

64. In 2011, CAT was concerned by the situation of institutionalized children with metal disabilities, while noting the envisaged transition from institutional to community-based care.[146] In 2012, CESCR was concerned about the reduced impact of existing plans and strategies on children with disabilities who were in institutions, and about the lack of services to prepare the integration into society of persons who leave institutional care.[147]

65. CAT was concerned at information about violent and discriminatory practices against children and adults with disabilities in medical institutions.[148] It was also concerned that persons with mental disabilities in institutions did not enjoy adequate legal safeguards and procedural guarantees regarding the respect of their right to mental and physical integrity, that persons deprived of their legal capacity and whose decisions and preference were not taken into account had no means to challenge the violation of their rights and that admission procedures and systems of guardianship often included officials from the institutions in which persons with disabilities were confined.[149] The HR Committee expressed similar concerns.[150] CAT[151] and the HR Committee[152] made several recommendations in this respect.

66. CESCR was concerned at reports that children with disabilities continued to be victims of segregation in the school system.[153] UNICEF recommended that Bulgaria continue its efforts to include children with disabilities in the general school system and reduce the number of schools for children with special educational needs.[154]

K. Minorities

67. While taking note of the recognition of "ethnic diversity" in the Constitution, CESCR was concerned about the lack of official recognition of national minorities.[155] The Independent Expert on minority issues stated that the Government denied the existence of an ethnic Macedonian minority, and did not recognize the Pomaks as a distinct minority – claiming that both groups were ethnic Bulgarians. The Government should ensure and protect the right to ethnic self-identification.[156] Bulgaria commented that it adhered strictly to the principle that ethnic identity was a matter of free personal choice.[157]

68. The Independent Expert on minority issues stated that high levels of unemployment, poor access to labour markets and low levels of skills and training represented significant contributing factors to the cycle of social exclusion and poverty experienced by many Roma. The majority of the Roma who were employed worked in low-skilled, low-wage and low-status jobs.[158] She stated that a new holistic approach to Roma integration, designed and implemented in full consultation with Roma organizations, was required to break the vicious circle of social exclusion and poverty.[159]

69. The Independent Expert on minority issues noted inadequate living conditions of Roma and that Roma communities remained de facto segregated and largely neglected, including in terms of efforts to improve infrastructure and the provision of services, water and sanitation.[160] CESCR and the HR Committee were concerned about the numerous forced evictions affecting Roma.[161] UNICEF noted that those evictions were carried out without the provision of an alternative accommodation.[162] The HR Committee urged Bulgaria to strictly limit the use of forced evictions through the adoption of all feasible alternatives to eviction and to guarantee alternative housing for affected families.[163]

70. CESCR was concerned at reports that Roma children continued to be victims of segregation in the school system.[164] The Independent Expert on minority issues stated that the vast majority of Roma children remained in substandard de facto segregated schools in Roma neighbourhoods that remained a significant barrier to improving the educational

outcomes of Roma children. Enrolment levels of Roma children were much lower than the average at all levels of education.[165] CEDAW urged Bulgaria to fully implement the strategy for educational integration of children and students from ethnic minorities and the National Roma Integration Strategy (2012-2020).[166]

71. The Independent Expert on minority issues stated that the Government's position not to allow the use of mother tongue languages as the language of instruction in schools, particularly in regions where minorities were a majority or constituted a large percentage of the population, was a concern for minorities, including the Roma, Turkish and Macedonians. She urged the Government to consider introducing bilingual education.[167]

L. Migrants, refugees and asylum seekers

72. CEDAW recommended that Bulgaria consider gender persecution as a ground for recognition of refugee status.[168] UNHCR made a similar recommendation.[169]

73. UNHCR stated that challenges relating to the timely transfer of asylum seekers to State Agency for Refugees had multiplied in mid-2013 with the increase of arrivals and the lack of reception and processing capacity of the Refugee Status Determination procedure. It noted the construction of a 33-km fence along the border. UNHCR stated that those measures could have resulted in violation of Bulgaria's international obligations towards refugees and the principle of non-refoulement. It was concerned about reports that individuals who might be in need of international protection had been prevented from reaching or entering the territory of Bulgaria.[170]

74. UNHCR recommended that Bulgaria ensure full respect of the principle of non-refoulement and facilitate access of persons in need of international protection to fair and efficient asylum procedures.[171] CAT recommended that Bulgaria amend its legislation to guarantee a suspensive in-country right of appeal and respect for all safeguards and interim measures with regard to asylum and deportation procedures pending the outcome of the appeals.[172]

75. CAT recommended that Bulgaria amend legislation to remove the rule allowing for the detention of asylum seekers on the basis of illegal entry and that the detention of asylum seekers is only used as a last resort.[173]

76. UNHCR stated that unaccompanied children were not appointed a guardian but instead represented during the Refugee Status Determination procedure by a social worker who was not legally authorized to represent the child in matters of daily life.[174] UNICEF made a similar observation. It noted the absence of adequate solution for the accommodation of the unaccompanied minors and of mechanism for family reunification.[175]

77. UNHCR stated that, although asylum seeking and refugee children were legally entitled to access to education, access was limited in practice owing to the requirement of passing exams in Bulgarian. It recommended that Bulgaria respond to the practical absence of access to formal primary education for asylum seeking children.[176]

78. UNICEF reported that recreational activities for children in the reception centres were sporadic, mainly organized by volunteers and that language classes were organized by UNHCR.[177]

79. CESCR was concerned that asylum seekers were not allowed to work during their first year in Bulgaria and only had access to the monthly allowance in application with the Social Assistance Act. It recommended that Bulgaria amend its legislation, allowing asylum seekers to obtain a work permit within the year of their arrival and reinforce its National

Programme for the Integration of Refugees, providing special attention to vulnerable persons.[178]

80. UNHCR recommended that Bulgaria facilitate the effective integration of beneficiaries of international protection with the view to achieving the full realization of all basic socioeconomic rights and provide intensive and quality Bulgarian language courses to facilitate the naturalization of beneficiaries of international protection.[179]

81. UNHCR and CAT recommended that Bulgaria incorporate the definition of a stateless person in its legislation in line with the Convention relating to the Status of Stateless Persons and establish a statelessness determination procedure to ensure stateless persons enjoy their basic human rights.[180]

Notes

[1] Unless indicated otherwise, the status of ratification of instruments listed in the table may be found on the official website of the United Nations Treaty Collection database, Office of Legal Affairs of the United Nations Secretariat, http://treaties.un.org/. Please also refer to the United Nations compilation on Bulgaria from the previous cycle (A/HRC/WG.6/9/BGR/2).

[2] The following abbreviations have been used in the present document:

ICERD	International Convention on the Elimination of All Forms of Racial Discrimination;
ICESCR	International Covenant on Economic, Social and Cultural Rights;
OP-ICESCR	Optional Protocol to ICESCR;
ICCPR	International Covenant on Civil and Political Rights;
ICCPR-OP 1	Optional Protocol to ICCPR;
ICCPR-OP 2	Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty;
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women;
OP-CEDAW	Optional Protocol to CEDAW;
CAT	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
OP-CAT	Optional Protocol to CAT;
CRC	Convention on the Rights of the Child;
OP-CRC-AC	Optional Protocol to CRC on the involvement of children in armed conflict;
OP-CRC-SC	Optional Protocol to CRC on the sale of children, child prostitution and child pornography;
OP-CRC-IC	Optional Protocol to CRC on a communications procedure;
ICRMW	International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
CRPD	Convention on the Rights of Persons with Disabilities;
OP-CRPD	Optional Protocol to CRPD;
ICPPED	International Convention for the Protection of All Persons from Enforced Disappearance.

[3] Individual complaints: ICCPR-OP 1, art. 1; OP-CEDAW, art. 1; OP-CRPD, art. 1; OP-ICESCR, art. 1; OP-CRC-IC, art. 5; ICERD, art. 14; CAT, art. 22; ICRMW, art. 77; and ICPPED, art. 31. Inquiry procedure: OP-CEDAW, art. 8; CAT, art. 20; ICPPED, art. 33; OP-CRPD, art. 6; OP-ICESCR, art. 11; and OP-CRC-IC, art. 13. Inter-State complaints: ICCPR, art. 41; ICRMW, art. 76; ICPPED, art. 32; CAT, art. 21; OP-ICESCR, art. 10; and OP-CRC-IC, art. 12. Urgent action: ICPPED, art. 30.

[4] See the concluding observations of the Committee against Torture (CAT/C/BGR/CO/4-5), para. 32 and the concluding observations of the Committee on the Elimination of Discrimination against Women (CEDAW/C/BGR/CO/4-7), para. 54.

[5] See CAT/C/BGR/CO/4-5, para. 32, the concluding observations of the Committee on Economic, Social and Cultural Rights on the combined fourth and fifth reports of Bulgaria (E/C.12/BGR/CO/4-5), para. 24 and CEDAW/C/BGR/CO/4-7, para. 54.

[6] E/C.12/BGR/CO/4-5, para. 24. See also CEDAW/C/BGR/CO/4-7, para. 54.

[7] CAT/C/BGR/CO/4-5, para. 32.

[8] See Office of the United Nations High Commissioner for Refugees (UNHCR), submission to the UPR of Bulgaria, p. 9.

[9] Geneva Convention for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field (First Convention); Geneva Convention for the Amelioration of the Condition of Wounded, Sick and Shipwrecked Members of Armed Forces at Sea (Second Convention); Geneva Convention relative to the Treatment of Prisoners of War (Third Convention); Geneva Convention relative to the Protection of Civilian Persons in Time of War (Fourth Convention); Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I); Protocol Additional to the Geneva Conventions of

12 August 1949, and relating to the Protection of Victims of Non-International Armed Conflicts (Protocol II); Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Adoption of an Additional Distinctive Emblem (Protocol III). For the official status of ratifications, see International Committee of the Red Cross, at https://www.icrc.org/IHL.

[10] Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

[11] International Labour Organization Convention No. 29 concerning Forced or Compulsory Labour; Convention No. 105 concerning the Abolition of Forced Labour; Convention No. 87 concerning Freedom of Association and Protection of the Right to Organise; Convention No. 98 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively; Convention No. 100 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value; Convention No. 111 concerning Discrimination in Respect of Employment and Occupation; Convention No. 138 concerning Minimum Age for Admission to Employment; Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

[12] 1961 Convention on the Reduction of Statelessness and 1961 Convention on the Reduction of Statelessness.

[13] International Labour Organization Convention No. 169 concerning Indigenous and Tribal Peoples in Independent Countries and Convention No. 189 concerning Decent Work for Domestic Workers.

[14] According to article 5 of the rules of procedure of the International Coordinating Committee of National Institutions for the Promotion and Protection of Human Rights (ICC) Sub-Committee on Accreditation, the classifications for accreditation used by the Sub-Committee are: A: Voting Member (fully in compliance with each of the Paris Principles), B: Non-Voting Member (not fully in compliance with each of the Paris Principles or insufficient information provided to make a determination), C: No Status (not in compliance with the Paris Principles).

[15] For the list of national human rights institutions with accreditation status granted by the International Coordinating Committee of National Institutions for the Promotion and Protection of Human Rights (ICC), see A/HRC/27/40, annex.

[16] CAT/C/BGR/CO/4-5, para. 13, E/C.12/BGR/CO/4-5, para. 6 and CEDAW/C/BGR/CO/4-7, para. 14.

[17] See the report of the independent expert on minority issues (A/HRC/19/56/Add.2), para. 98.

[18] CEDAW/C/BGR/CO/4-7, para. 15. See also paras. 9-10.

[19] http://lib.ohchr.org/HRBodies/UPR/Documents/Session7/KZ/KazakhstanFollowUp.pdf.

[20] The following abbreviations have been used in the present document:

CERD	Committee on the Elimination of Racial Discrimination;
CESCR	Committee on Economic, Social and Cultural Rights;
HR Committee	Human Rights Committee;
CEDAW	Committee on the Elimination of Discrimination against Women;
CAT	Committee against Torture;
CRC	Committee on the Rights of the Child;
CRPD	Committee on the Rights of Persons with Disabilities.

[21] See the concluding observations of the Committee on the Elimination of Racial Discrimination (CERD/C/BGR/CO/19), para. 27.

[22] See the concluding observations of the Human Rights Committee (CCPR/C/BGR/CO/3), para. 28.

[23] CEDAW/C/BRG/CO/4-7, para. 55.

[24] CAT/C/BGR/CO/4-5, para. 35.

[25] See information received from the Government of Bulgaria on the implementation of the concluding observations (CERD/C/BGR/CO/19/Add.1).

[26] Letter from the Chairperson of CERD to the Permanent Mission of Bulgaria to the United Nation Office at Geneva, dated 11 March 2011, available from http://tbinternet.ohchr.org/Treaties/CERD/Shared%20Documents/BGR/INT_CERD_FUL_BGR_11949_E.pdf.

[27] See information received from Bulgaria on follow-up to the concluding observations (CCPR/C/BGR/CO/3/Add.1). See also letters from the HR Committee to the Permanent Mission of Bulgaria to the United Nation Office at Geneva, dated 16 November 2012 and 2 December 2013, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FUL_BGR_15862_E.pdf; and

http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FUL_BGR_15861_E.pdf.

[28] See information received from Bulgaria on follow-up to the concluding observations, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FCO_BGR_19603_E.pdf.

[29] See information received from Bulgaria on follow-up to the concluding observations (CCPR/C/BGR/CO/3/Add.2). See also letter from the HR Committee to the Permanent Mission of Bulgaria to the United Nation Office at Geneva, dated 27 November 2014, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FUL_BGR_19330_E.pdf.

[30] Information provided by Bulgaria in follow-up to the concluding observations (CEDAW/C/BGR/CO/4-7/Add.1).

[31] See information received from Bulgaria on the implementation of the Committee's concluding observations (CAT/C/BGR/CO/4-5/Add.1). See also letter from CAT to the Permanent Mission of Bulgaria to the United Nation Office at Geneva, dated 1 December 2012, available from http://tbinternet.ohchr.org/Treaties/CAT/Shared%20Documents/BGR/INT_CAT_FUL_BGR_12921_E.pdf.

[32] CCPR/C/106/DR/2073/2011.

[33] CEDAW/C/49/D/20/2008 and CEDAW/C/53/D/31/2011.

[34] CCPR/C/106/DR/2073/2011, para. 17.

[35] CEDAW/C/49/D/20/2008, para. 9.17 and CEDAW/C/53/D/31/2011, para.11.

[36] For the titles of special procedures, see www.ohchr.org/EN/HRBodies/SP/Pages/Themes.aspx and www.ohchr.org/EN/HRBodies/SP/Pages/Countries.aspx.

[37] A/HRC/19/56/Add.2 and Comments by the Bulgarian authorities in A/HRC/19/G/11.

[38] See Office of the High Commissioner for Human Rights (OHCHR) Report 2012, p. 117 and OHCHR Report 2013, p. 131.

[39] CCPR/C/BGR/CO/3, para. 6.

[40] CEDAW/C/BGR/CO/4-7, para. 21. See also E/C.12/BGR/CO/4-5, para. 8.

[41] CEDAW/C/BGR/CO/4-7, para. 11. See also CCPR/C/BGR/CO/3, para. 6 and E/C.12/BGR/CO/4-5, para. 8.

[42] CEDAW/C/BGR/CO/4-7/Add.1, pp. 2 and 3.

[43] E/C.12/BGR/CO/4-5, para. 8.

[44] CEDAW/C/BGR/CO/4-7, paras. 31 and 33.

[45] Ibid., paras. 43 and 44.

[46] Ibid., paras. 32-34.

[47] CAT/C/BGR/CO/4-5, para. 28. See also E/C.12/BGR/CO/4-5, para. 7.

[48] CCPR/C/BGR/CO/3, paras. 9 and 26, and E/C.12/BGR/CO/4-5, para. 7.

[49] CAT/C/BGR/CO/4-5, para. 28. See also CCPR/C/BGR/CO/3, paras. 9 and 26, and A/HRC/19/56/Add.2, para. 90.

[50] A/HRC/19/56/Add.2, para. 92. See also A/HRC/19/G/11, paras. 6 and 8.

[51] CCPR/C/BGR/CO/3, para. 9. See also UNHCR, submission to the UPR of Bulgaria, p. 8.

[52] CCPR/C/BGR/CO/3, para. 7. See also E/C.12/BGR/CO/4-5, para. 7.

[53] A/HRC/19/56/Add.2, paras. 72 and 76. See also para. 13, 15 and 16.

[54] OHCHR, submission to the UPR of Bulgaria, p.8.

[55] CAT/C/BGR/CO/4-5, para. 28.

[56] UNHCR, submission to the UPR of Bulgaria, pp. 8 and 9.

[57] CAT/C/BGR/CO/4-5, para. 28.

[58] CCPR/C/BGR/CO/3, para. 9, See also paras. 7 and 26.

[59] E/C.12/BGR/CO/4-5, para. 7.

[60] A/HRC/19/56/Add.2, para.84.

[61] CAT/C/BGR/CO/4-5, para. 19.

[62] CCPR/C/BGR/CO/3, para. 8. See also CAT/C/BGR/CO/4-5, para. 10.

[63] CAT/C/BGR/CO/4-5, para. 8 and 17. See also CCPR/C/BGR/CO/3, para. 13.

[64] CAT/C/BGR/CO/4-5, para. 10. See also para. 28.

[65] CAT/C/BGR/CO/4-5, para. 10 and CCPR/C/BGR/CO/3, para. 11.

[66] CCPR/C/BGR/CO/3/Add.1, pp. 5-7.

[67] Letter from the HR Committee to the Permanent Mission of Bulgaria to the United Nation Office at Geneva, dated 2 December 2013, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FUL_BGR_15861_E.pdf.

[68] See information received from Bulgaria on follow-up to the concluding observations, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FCO_BGR_19603_E.pdf.

[69] CAT/C/BGR/CO/4-5, para. 22.

[70] CCPR/C/BGR/CO/3, para. 18.

[71] CAT/C/BGR/CO/4-5, para. 21.

[72] Ibid., para. 23.

[73] Ibid., para. 24.

[74] Ibid..

[75] CEDAW/C/BGR/CO/4-7, para. 25 and E/C.12/BGR/CO/4-5, para. 15.

[76] CCPR/C/BGR/CO/3, para. 12. See also E/C.12/BGR/CO/4-5, para. 15 and CAT/C/BGR/CO/4-5, para. 25.

[77] CAT/C/BGR/CO/4-5, para. 25 and CCPR/C/BGR/CO/3, para. 12.

[78] CEDAW/C/BGR/CO/4-7, para. 23.

[79] CCPR/C/BGR/CO/3, para. 12. See also CAT/C/BGR/CO/4-5, para. 25 and United Nations Children's Fund (UNICEF), submission to the UPR of Bulgaria, p. 6.

[80] CEDAW/C/BGR/CO/4-7, para.26.

[81] CEDAW/C/BGR/CO/4-7, para. 26. See also CAT/C/BGR/CO/4-5, para. 25 and E/C.12/BGR/CO/4-5, para. 15.

[82] CEDAW/C/BGR/CO/4-7, para. 24. See also E/C.12/BGR/CO/4-5, para. 15 and CAT/C/BGR/CO/4-5, para. 25.

[83] CEDAW/C/BGR/CO/4-7/Add.1, p. 3.

[84] CAT/C/BGR/CO/4-5, para. 26.

[85] CEDAW/C/BGR/CO/4-7, para. 49.

[86] CCPR/C/BGR/CO/3, para. 15.

[87] CAT/C/BGR/CO/4-5, para. 26. See also CEDAW/C/BGR/CO/4-7, para. 50 and CCPR/C/BGR/CO/3, para. 15.

[88] UNICEF, submission to the UPR of Bulgaria, para. 26.

[89] CAT/C/BGR/CO/4-5, para. 30.

[90] CCPR/C/BGR/CO/3, para. 14.

[91] E/C.12/BGR/CO/4-5, para. 10.

[92] ILO Committee of Experts on the Application of Conventions and Recommendations, direct request concerning the ILO Worst Forms of Child Labour Convention, 1999 (No. 182) – Bulgaria, adopted in 2011, published by the International Labour Conference at its 101st session (2012), http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:2700550:NO.http:///

[93] E/C.12/BGR/CO/4-5, para. 16. See also CAT/C/BGR/CO/4-5, para. 27 and CEDAW/C/BGR/CO/4-7, para. 5.

[94] CEDAW/C/BGR/CO/4-7, para. 27. See also CAT/C/BGR/CO/4-5, para. 27.

[95] CAT/C/BGR/CO/4-5, para. 12.

[96] CCPR/C/BGR/CO/3, para. 21.

[97] Letter from the HR Committee to the Permanent Mission of Bulgaria to the United Nation Office at Geneva, dated 2 December 2013, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FUL_BGR_15861_E.pdf.

[98] See letter from the HR Committee to the Permancnt Mission of Bulgaria to the United Nation Office at Geneva, dated 27 November 2014, available from http://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_FUL_BGR_19330_E.pdf.

[99] CAT/C/BGR/CO/4-5, para. 12.

[100] A/HRC/20/19/Add.2, para. 94.

[101] A/HRC/20/19/Add.2, paras. 55 and 99. See also CAT/C/BGR/CO/4-5, para. 12.
[102] A/HRC/20/19/Add.2, para. 98.
[103] Ibid., para. 102.
[104] CAT/C/BGR/CO/4-5, para. 9.
[105] CAT/C/BGR/CO/4-5/Add.1, paras. 2-9.
[106] CAT/C/BGR/CO/4-5, para. 18.
[107] CAT/C/BGR/CO/4-5, para. 29. See also CCPR/C/BGR/CO/3, para. 8.
[108] UNICEF, submission to the UPR of Bulgaria, para. 20.
[109] CCPR/C/BGR/CO/3, para. 23.
[110] UNICEF, submission to the UPR of Bulgaria, para. 23.
[111] CCPR/C/BGR/CO/3, para. 20. See also CAT/C/BGR/CO/4-5, para. 12.
[112] CAT/C/BGR/CO/4-5, para. 12.
[113] CCPR/C/BGR/CO/3, para. 18.
[114] A/HRC/20/19/Add.2, para.20.
[115] Ibid., para. 97(d).
[116] CCPR/C/BGR/CO/3, para. 22.
[117] CEDAW/C/BGR/CO/4-7, para. 48.
[118] E/C.12/BGR/CO/4-5, para. 17.
[119] Ibid..
[120] UNICEF, submission for the UPR of Bulgaria, para. 7.
[121] CAT/C/BGR/CO/4-5, para. 19.
[122] CCPR/C/BGR/CO/3, para. 19. See also E/C.12/BGR/CO/4-5, para. 14.
[123] Ibid..
[124] E/C.12/BGR/CO/4-5, para. 14.
[125] CCPR/C/BGR/CO/3, para. 25.
[126] United Nations Educational, Scientific and Cultural Organization (UNESCO), submission to the UPR of Bulgaria, para. 28.
[127] Ibid., para. 29.
[128] CEDAW/C/BGR/CO/4-7, para. 30. See also para. 19.
[129] A/HRC/20/19/Add.2, para. 104.
[130] E/C.12/BGR/CO/4-5, para. 11.
[131] ILO Committee of Experts on the Application of Conventions and Recommendations, direct request concerning ILO Employment Policy Convention, 1964 (No. 122) – Bulgaria, adopted in 2011, published by the International Labour Conference at its 101st session (2012), available from www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:2699674:NO.
[132] E/C.12/BGR/CO/4-5, para. 13.
[133] Ibid., para. 18.
[134] CEDAW/C/BGR/CO/4-7, para. 39.
[135] E/C.12/BGR/CO/4-5, para. 19.
[136] UNICEF, submission to the UPR of Bulgaria, para. 10.
[137] Ibid., para. 11. See also CEDAW/C/BGR/CO/4-7, para. 37.
[138] CEDAW/C/BGR/CO/4-7, para. 35.
[139] E/C.12/BGR/CO/4-5, para. 20.
[140] CEDAW/C/BGR/CO/4-7, para. 36. See also E/C.12/BGR/CO/4-5, para. 20.
[141] E/C.12/BGR/CO/4-5, para. 21.
[142] Ibid., para. 22. See also UNICEF, submission to the UPR of Bulgaria, paras. 14 and 18.
[143] CEDAW/C/BGR/CO/4-7, para. 31. See also A/HRC/19/56/Add.2, paras. 17 and 24.
[144] UNICEF, submission to the UPR of Bulgaria, para. 19.
[145] UNESCO, submission to the UPR of Bulgaria, paras. 27.2 and 27.3.
[146] CAT/C/BGR/CO/4-5, para. 19 (b).
[147] E/C.12/BGR/CO/4-5, para. 14. See also CCPR/C/BGR/CO/3, para. 10, CAT/C/BGR/CO/4-5, para. 10 and UNICEF, submission to the UPR of Bulgaria, para. 9.
[148] CAT/C/BGR/CO/4-5, para. 10. See also UNICEF, submission to the UPR of Bulgaria, para. 24.
[149] CAT/C/BGR/CO/4-5, para. 19.
[150] CCPR/C/BGR/CO/3, para. 17.
[151] CAT/C/BGR/CO/4-5, para. 19.

[152] CCPR/C/BGR/CO/3, para. 17.
[153] E/C.12/BGR/CO/4-5, para. 22.
[154] UNICEF, submission to the UPR of Bulgaria, p. 7.
[155] E/C.12/BGR/CO/4-5, para. 23.
[156] A/HRC/19/56/Add.2, paras. 66 and 93.
[157] A/HRC/19/G/11, para. 9.
[158] A/HRC/19/56/Add.2, para.83.
[159] Ibid., para. 74. See also A/HRC/19/G/11, para. 7.
[160] A/HRC/19/56/Add.2, para.87. See also A/HRC/19/G/11, para. 7.
[161] E/C.12/BGR/CO/4-5, para. 19 and CCPR/C/BGR/CO/3, para. 24.
[162] UNICEF, submission to the UPR of Bulgaria, para. 33.
[163] CCPR/C/BGR/CO/3, para. 24. See also E/C.12/BGR/CO/4-5, para. 19.
[164] E/C.12/BGR/CO/4-5, para. 22.
[165] A/HRC/19/56/Add.2, paras.79, 24 and 26. See also A/HRC/19/G/11, para. 7.
[166] CEDAW/C/BGR/CO/4-7, para. 32. See also A/HRC/19/56/Add.2, para.82.
[167] A/HRC/19/56/Add.2, para. 97. See also A/HRC/19/G/11, para. 4.
[168] CEDAW/C/BGR/CO/4-7, para. 46.
[169] UNHCR, submission to the UPR of Bulgaria, p. 7.
[170] Ibid., p. 3.
[171] Ibid., p. 4. See also CCPR/C/BGR/CO/3, para. 16 and CAT/C/BGR/CO/4-5, para. 16.
[172] CAT/C/BGR/CO/4-5, para. 16, see also para. 14.
[173] Ibid., para. 14.
[174] UNHCR, submission to the UPR of Bulgaria, p. 4.
[175] UNICEF, submission to the UPR of Bulgaria, paras. 28 and 29.
[176] UNHCR, submission to the UPR of Bulgaria, p. 5. See also UNICEF, submission to the UPR of Bulgaria, paras. 30 and 31.
[177] UNICEF, submission to the UPR of Bulgaria, para. 32.
[178] E/C.12/BGR/CO/4-5, para. 9. See also CAT/C/BGR/CO/4-5, para. 14.
[179] UNHCR, submission to the UPR of Bulgaria, p. 8.
[180] Ibid., p. 9 and CAT/C/BGR/CO/4-5, para. 15.